

Index to Volume 2

Author Index

AUSTER, ROLF, <i>The Erratic History of the Taxation of Option Writers with Special Reference to the Straddle</i>	333
BELLOWS, CARL D., <i>Recent Cases and Rulings on the Taxation of Trusts and Estates: Grantor Trust Subject to Section 678 Deemed Not to Be a Viable Tax Entity</i>	374
BROMBERG, BARBARA SCHWARTZ, <i>Tax Planning for Professionals:</i>	
<i>Planning Opportunities via Installment Redemptions</i>	345
<i>Planning Opportunities via Redemptions and Subchapter S Corporations</i>	344
<i>Planning Opportunities via Section 306 Stock</i>	343
<i>Planning Opportunities via Stock Redemptions</i>	341
<i>Trust-Leaseback Arrangements</i>	40
<i>Use of a Separate Service Corporation—What Can It Achieve?</i>	131
EBER, VICTOR I., <i>The CPA's Role in Appraising Closely Held Corporate Stock</i>	25
FOX, H. LAWRENCE & JACKSON, JAMES K., <i>Washington Tax Watch:</i>	
<i>Corporate Integration Proposals</i>	55
<i>Nonqualified Deferred Compensation Plans</i> ..	359
<i>Summary of Administration's Tax Proposals Primarily Affecting Individuals</i>	156
GAUBATZ, JOHN T., <i>Planning with Grantor Powers and Gift-Splitting Under the Tax Reform Act</i>	3
HARRIS, SONDRRA R., <i>Article Digests</i>	82, 178, 275, 383

Index to Volume 2

Author Index

AUSTER, ROLF, <i>The Erratic History of the Taxation of Option Writers with Special Reference to the Straddle</i>	333
BELLOWS, CARL D., <i>Recent Cases and Rulings on the Taxation of Trusts and Estates: Grantor Trust Subject to Section 678 Deemed Not to Be a Viable Tax Entity</i>	374
BROMBERG, BARBARA SCHWARTZ, <i>Tax Planning for Professionals:</i>	
<i>Planning Opportunities via Installment Redemptions</i>	345
<i>Planning Opportunities via Redemptions and Subchapter S Corporations</i>	344
<i>Planning Opportunities via Section 306 Stock</i>	343
<i>Planning Opportunities via Stock Redemptions</i>	341
<i>Trust-Leaseback Arrangements</i>	40
<i>Use of a Separate Service Corporation—What Can It Achieve?</i>	131
EBER, VICTOR I., <i>The CPA's Role in Appraising Closely Held Corporate Stock</i>	25
FOX, H. LAWRENCE & JACKSON, JAMES K., <i>Washington Tax Watch:</i>	
<i>Corporate Integration Proposals</i>	55
<i>Nonqualified Deferred Compensation Plans</i> ..	359
<i>Summary of Administration's Tax Proposals Primarily Affecting Individuals</i>	156
GAUBATZ, JOHN T., <i>Planning with Grantor Powers and Gift-Splitting Under the Tax Reform Act</i>	3
HARRIS, SONDRRA R., <i>Article Digests</i>	82, 178, 275, 383

KLEIN, PAUL E., <i>Insurance Developments:</i>	
<i>Tax Consequences of Insurance Policy Held in Trust by Spouse</i>	53
KROLL, ARTHUR H., <i>Executive Compensation:</i>	
<i>Funding Employee Benefits Through a Section 501(c)(9) Trust</i>	250
<i>Nonqualified Options After TRA 1976</i>	51
<i>Tax-Planning Possibilities of IRAs and Roll- overs</i>	152
LANGER, MARSHALL J., <i>International Develop- ments:</i>	
<i>The Need for Reform in the Tax Treaty Area—Anti-Expatriation Measures</i>	254
LEE, LAWRENCE J., <i>Investment Planning:</i>	
<i>How to Handle a Negative Capital Account When a Partner Dies</i>	241
<i>Impact of Mini-Tax Amendments on Tax Shelters</i>	43
<i>Post-Retirement Financial Arrangements and Social Security Benefits</i>	346
<i>Survey of Tax Shelters</i>	136
LIPKA, ROLAND & GOODMAN, LEONARD, <i>Choosing Between a Lump-Sum Distribution as Either Ordinary Income or Capital Gain</i>	
	118
MCCAFFREY, CARLYN S., <i>Recent Cases and Rul- ings on Estate and Gift Taxation:</i>	
<i>Annuity Payable by Wholly Owned Corpo- ration Qualifies for Marital Deduction</i> ...	266
<i>Deferred Estate Tax Interest Payments De- ductible as Administrative Expense</i>	79
<i>Elective Bequests Qualify for Marital Deduc- tion</i>	73
<i>Executor's Commissions Authorized by Will Not Deductible to Extent of Excess Over Statutory Commissions</i>	75

<i>Marital Deduction-Equalization Clauses Approved</i>	270
<i>Notes Are Not Consideration When Donor Intends to Forgive Them</i>	173
<i>Post-Death Interest—Deductibility Depends on Source of Indebtedness</i>	368
<i>Power to Invade Treated as General Power</i> ..	77
<i>Transfer of Joint Tenancy Property to Revocable Trust Does Not Sever Joint Tenancy</i>	370
<i>Transfers Between Spouses</i>	167
<i>Transfers to Charity Within Three Years of Death Held to Have Been Made in Contemplation of Death</i>	372
<i>Value of Installment Note May Not Be Discounted to Reflect Future Income Tax Liability</i>	272
 MCGRATH, THOMAS, J. & BLATTMACHR, JONATHAN G., <i>Pre-Death Estate Planning Under the Tax Reform Act Carryover Basis Rules</i>	100
 PESCHEL, JOHN L., <i>Uses of Trusts in Tax Planning</i>	
<i>Family Members as Trustees: Part I—Tax Problems for the Grantor</i>	142
<i>Family Members as Trustees: Part II—Tax Problems for the Trustee/Beneficiary</i>	351
 POSTLEWAITE, PHILIP F., <i>Deductibility of Expenses for Conventions and Educational Seminars—A Need for Further Reform</i>	203
 ROTH, LEONARD S., <i>Gifts of Soon-to-Be-Liquidated Corporate Stock Made to Charitable Organizations—Ramifications of Jones</i>	87
 SACKS, MASON J. & MCCAHAH, J. BRUCE, <i>Professional Corporations: Protecting Corporate Status for Federal Income Tax Purposes</i>	19
 SINGER, STUART R., <i>Current Issues in Federal Taxation of Nonresident Aliens</i>	183

SIRKIN, MICHAEL S., <i>Pension Aspects of the Incorporation Dilemma</i>	310
TUCKER, STEFAN F., <i>Corporations: Tax Shelters for the Individual Shareholder</i>	279
WARD, LARRY D., <i>Recent Cases and Rulings on the Income Taxation of Individuals:</i>	
<i>Carryover Basis: The Fresh-Start Adjustment</i>	60
<i>[The] Demise of the Standard Deduction—</i>	
<i>What's in a Name?</i>	161
<i>How to Handle Medical Expenses Incurred</i>	
<i>Prior to the Death of a Decedent</i>	164
<i>Income Tax Treatment of Donee-Paid Gift</i>	
<i>Tax</i>	257
<i>Net Operating Losses and Worthless Stock in</i>	
<i>a Subchapter S Corporation: The Relation-</i>	
<i>ship Between Sections 165(g) and 1374</i> ..	364

Title Index

Article Digests, <i>Sondra R. Harris</i>	82, 178, 275, 383
Choosing Between Treating a Lump-Sum Distribution as Either Ordinary Income or Capital Gain, <i>Roland Lipka & Leonard Goodman</i> ..	118
Corporations: Tax Shelters for the Individual Shareholder, <i>Stefan F. Tucker</i>	279
[The] CPA's Role in Appraising Closely Held Corporate Stock, <i>Victor I. Eber</i>	25
Current Issues in Federal Taxation of Nonresident Aliens, <i>Stuart R. Singer</i>	183
Deductibility of Expenses for Conventions and Educational Seminars—A Need for Further Reform, <i>Philip F. Postlewaite</i>	203

[The] Erratic History of the Taxation of Option Writers with Special Reference to the Straddle, <i>Rolf Auster</i>	333
Executive Compensation: <i>Arthur H. Kroll</i>	
Funding Employee Benefits Through a Section 501(c)(9) Trust	250
Nonqualified Options After TRA 1976	51
Tax-Planning Possibilities of IRAs and Roll- overs	152
Gifts of Soon-to-Be-Liquidated Corporate Stock Made to Charitable Organizations—Ramifica- tions of Jones, <i>Leonard S. Roth</i>	87
Insurance Developments: <i>Paul E. Klein</i>	
Tax Consequences of Insurance Policy Held in Trust by Spouse	53
International Developments: <i>Marshall J. Langer</i>	
The Need for Reform in the Tax Treaty Area—Anti-Expatriation Measures	254
Investment Planning: <i>Lawrence J. Lee</i>	
How to Handle a Negative Capital Account When a Partner Dies	241
Impact of Mini-Tax Amendments on Tax Shel- ters	43
Post-Retirement Financial Arrangements and Social Security Benefits	346
Survey of Tax Shelters	136
Pension Aspects of the Incorporation Dilemma, <i>Michael S. Sirkin</i>	310
Planning with Grantor Powers and Gift-Splitting Under the Tax Reform Act, <i>John T. Gaubatz</i>	3
Pre-Death Estate Planning Under the 1976 Tax Reform Act Carryover Basis Rules, <i>Thomas J. McGrath & Jonathan G. Blattmachr</i>	100

- Professional Corporations: Protecting Corporate Status for Federal Income Tax Purposes, *Mason J. Sacks & J. Bruce McCahan* 19

- Recent Cases and Rulings on Estate and Gift Taxation: *Carlyn S. McCaffrey*
- Annuity Payable by Wholly Owned Corporation Qualifies for Marital Deduction 266
 - Deferred Estate Tax Interest Payments Deductible as Administration Expense 79
 - Elective Bequests Qualify for Marital Deduction 73
 - Executor's Commissions Authorized by Will Not Deductible to Extent of Excess Over Statutory Commissions 75
 - Marital Deduction-Equalization Clauses Approved 270
 - Notes Are Not Consideration When Donor Intends to Forgive Them 173
 - Post-Death Interest—Deductibility Depends on Source of Indebtedness 368
 - Power to Invade Treated as General Power 77
 - Transfer of Joint Tenancy Property to Revocable Trust Does Not Sever Joint Tenancy 370
 - Transfers Between Spouses 167
 - Transfers to Charity Within Three Years of Death Held in Contemplation of Death . . 372
 - Value of Installment Note May Not Be Discounted to Reflect Future Income Tax Liability 272

- Recent Cases and Rulings on the Income Taxation of Individuals: *Larry D. Ward*
- Carryover Basis: The Fresh-Start Adjustment 60
 - The Demise of the Standard Deduction—What's in a Name? 161
 - How to Handle Medical Expenses Incurred Prior to the Death of a Decedent 164

Income Tax Treatment of Donee-Paid Gift Tax	257
Net Operating Losses and Worthless Stock in a Subchapter S Corporation: The Relationship Between Sections 165(g) and 1374 ..	364
Recent Cases and Rulings on the Taxation of Trusts and Estates: <i>Carl D. Bellows</i>	
Grantor Trust Subject to Section 678 Deemed Not to Be a Viable Tax Entity	374
Tax Planning for Professionals: <i>Barbara Schwartz Bromberg</i>	
Planning Opportunities via Installment Redemptions	345
Planning Opportunities via Redemptions and Subchapter S Corporations	344
Planning Opportunities via Section 306 Stock	343
Planning Opportunities via Stock Redemptions	341
Trust-Leaseback Arrangements	40
Use of a Separate Service Corporation—What Can It Achieve?	131
Uses of Trusts in Tax Planning, <i>John L. Peschel</i>	
Family Members as Trustees: Part I—Tax Problems for the Grantor	142
Family Members as Trustees: Part II—Tax Problems for the Trustee/Beneficiary	351
Washington Tax Watch: <i>H. Lawrence Fox & James K. Jackson</i>	
Corporate Integration Proposals	55
Nonqualified Deferred Compensation Plans ..	359
Summary of Administration's Tax Proposals Primarily Affecting Individuals	156

